

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 24-12480 (JTD)

(Jointly Administered)

Ref. Docket Nos. 254 & 296

**CERTIFICATION OF COUNSEL REGARDING
PROPOSED ORDER EXTENDING TIME TO FILE SCHEDULES OF
ASSETS AND LIABILITIES AND STATEMENTS OF FINANCIAL AFFAIRS**

On November 26, 2024, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”) filed the *Motion of Debtors for Entry of an Order Extending Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs* [Docket No. 254] (the “Motion”). A proposed form of order approving the Motion was attached to the Motion as Exhibit A (the “Proposed Order”).

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

The deadline to file objections or otherwise respond to the Motion was set as December 3, 2024, at 4:00 p.m. (ET) (the “Objection Deadline”). Prior to the Objection Deadline, the Ad Hoc Group of Freedom Lenders filed the *Objection of the Ad Hoc Group of Freedom Lenders to the Debtors’ Motion to Extend the Deadline to File SOFAs and Schedules* [Docket No. 296] (the “Freedom Lender Objection”).

On December 9, 2024, the Debtors filed the *Notice of Rescheduled Disclosure Statement Hearing* [Docket No. 373], thereby rescheduling the deadline to object to the *Disclosure Statement for the Joint Chapter 11 Plan of Franchise Group, Inc. and Its Affiliated Debtors* [Docket No. 151] (the “Disclosure Statement”) to January 3, 2025 at 4:00 p.m. (ET) and rescheduling the hearing to consider approval of the Disclosure Statement to January 15, 2025 at 10:00 a.m. (ET). The Ad Hoc Group of Freedom Lenders confirmed that this modified timeline resolves the Freedom Lender Objection.²

WHEREFORE, the Debtors did not receive any objections or responses other than that described herein, and the Ad Hoc Group of Freedom Lenders does not object to entry of the Proposed Order, the Debtors respectfully request that the Court enter the Proposed Order without further notice or a hearing at the Court’s earliest convenience.

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² There have been no changes made to the Proposed Order.

Dated: December 9, 2024
Wilmington, Delaware

**YOUNG CONAWAY STARGATT & TAYLOR,
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/s/ Shella Borovinskaya

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